Carya Ecological Services, LLC

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February 4, 2010

Paul E. Stacey
Connecticut Department of Environmental Protection
Planning and Standards Division
79 Elm Street
Hartford, CT 06040



RE: Proposed Streamflow Standards and Regulations

Dear Mr. Stacey:

This is a brief supplement to my comments, dated 1-28-10, from the perspective of my own scientific specialty: plant ecology. I have continued to think about the issue of how to regulate flow without causing undo economic hardship, providing the water needed, and also protecting and restoring stream and river communities.

The need for language protecting riparian wetlands was one of my points. Flood waters are important to riparian wetland ecological communities for *seed dispersal* and maintaining connectivity between plant subpopulations, as well as for water supply. Floodplain wetlands have an elevated likelihood of rare species, green dragon for example. Along the Quinnebaug River in Putnam, and a mile or so below a dam, I witnessed severe wetland habitat degradation, because overbank flooding had been eliminated. (I was doing a baseline habitat survey in 2001 of a 2+ mile long river segment). Effects of flow reduction (dilution reduction) on water quality of riparian pools, which can be vernal pools, are another consideration.

Each watercourse is unique and deserves site-specific analysis, which I anticipate will often show that greater withdrawals than the proposed caps are sustainable, and that watercourse restoration would actually increase sustainable water yields.

Respectfully submitted,

Sign N. Godwa

Sigrun N. Gadwa, MS, PWS

Ecologist and Registered Soil Scientist

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